

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA;
COMMONWEALTH OF
MASSACHUSETTS; STATE OF NEW
JERSEY; STATE OF COLORADO; STATE
OF ILLINOIS; STATE OF MARYLAND;
STATE OF NEW YORK; and STATE OF
WISCONSIN,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION;
DENISE CARTER, in her official capacity
as former Acting Secretary of Education and
current acting Chief Operating Officer,
Federal Student Aid; LINDA MCMAHON,
in her official capacity as Secretary of
Education,

Defendants.

Case No. 1:25-cv-10548

**DECLARATION OF ADELAIDE PAGANO IN SUPPORT OF PLAINTIFF STATES'
OPPOSITION TO DEFENDANTS' EMERGENCY MOTION TO STAY**

Adelaide Pagano, an attorney admitted to practice before this Court and admitted to practice before the Courts of Massachusetts, does hereby state the following under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am Adelaide Pagano, Assistant Attorney General in the Office of the Attorney General for the State of Massachusetts, and I appear on behalf of the Commonwealth of Massachusetts in this action.

2. I submit this declaration in support of Plaintiff States' Opposition to Defendants' Motion for a Stay of the Temporary Restraining Order Pending Appeal. The facts set forth herein are based upon my personal knowledge and/or a review of the files in my possession.

3. Attached hereto as Exhibit 1 is an email sent by an employee of the Department of Education to Principal Investigator Tanya Maloney at Montclair State University on March 11, 2025 at 7:21 p.m. The email is titled “Reopening of Terminated SEED and TQP Grants and Notice of Temporary Restraining Order.” The Temporary Restraining Order (TRO) entered by this Court was attached to the email.

Dated: Boston, Massachusetts

March 13, 2025

/s/ Adelaide Pagano

Adelaide Pagano

Assistant Attorney General

Office of the Attorney General

Commonwealth of Massachusetts

CERTIFICATE OF SERVICE

Counsel for Plaintiff States certify that they have submitted the foregoing document with the clerk of court of the District of Massachusetts, using the electronic case filing system of the Court. Counsel for Plaintiff States hereby certify that they have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Adelaide Pagano

Adelaide Pagano (BBO #690518)

Assistant Attorney General

Dated: March 13, 2025